REMARKS

Claims 1, 4-9, 11-20, 22-33 and 37-40 are pending in the present application. Claims 4-8, 14-20 and 22-33 are withdrawn from consideration. Claims 38 and 39 were added to incorporate subject matter recited in previously cancelled claims 2 and 3. Claim 40 was added to incorporate subject matter recited in previously cancelled claim 10.

Claims 1, 9 and 37 are rejected under 35 U.S.C. 112, first paragraph, as failing to comply with the written description requirement. Specifically, the Office Action states that the use of at least two methods for aligning said dry deposited layer introduces new matter into claim 1. Claims 1, 9 and 37 were amended to obviate the rejection. Applicants respectfully request withdrawal of the 112 rejection of claims 1, 9 and 37.

Claims 1, 9 and 37 are rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,493,050 B1 to Lien et al., hereinafter "Lien". Applicants amended claims 1, 9 and 37 to clarify features of the invention that are neither disclosed nor suggested by Lien.

Lien discloses liquid crystal display devices and methods for forming functional structures therefor. The method includes coating substrates with a vertical alignment layer such as a dry deposition vertical alignment layer (col. 6, lines 6-10).

Lien discloses the use of a photo mask in the context of controlling the deposition of a layer to form dams, post spacers and ridges using a single lithographic step, for example, column 4, lines 41-42, or column 5, lines 54-62, wherein the following is stated:

> "Advantageously, layer 120 is patterned using a single photo mask and photolithographic step. When layer 120 is patterned, a portion 130 of dam 110, a

portion 132 of post spacer 108 and pretilt structure 134 (in this case a ridge 114 is shown) are formed."

Lien also discloses achieving an almost zero pretilt alignment by a polymer alignment layer coating followed with polarizer UV alignment or by silicon oxide film coating followed by proper ion beam treatment (col. 6, lines 49-53).

However, Lien does not disclose selectively bombarding a dry deposited layer with ions to affect the alignment of the layer in selected areas. Lien also does not disclose aligning the dry deposited layer by bombarding the dry deposited layer with **at least a first particle beam and a second particle beam**. Furthermore, Lien does not disclose that a direction of the first particle beam with respect to the dry deposited layer is different than a direction of the second particle beam with respect to the dry deposited layer.

Lien does not disclose a method of preparing a multi-domain liquid-crystal display, "wherein said alignment is achieved by exposing said dry deposited layer to at least a first particle beam and a second particle beam, and wherein a direction of said first particle beam with respect to said dry deposited layer is different than a direction of said second particle beam with respect to said dry deposited layer," as recited in claim 1. Thus, Lien fails to disclose or suggest the elements of claim 1. Therefore, claim 1 is patentable over Lien.

Independent claims 9 and 37 recite features similar to claim 1. Therefore, for at least reasoning similar to that provided in support of claim 1, claims 9 and 37 are patentable over Lien.

For the reasons set forth above, it is submitted that the rejection of claims 1, 9 and 37 under 35 U.S.C. 102(e) as being unpatentable over Lien is overcome. Applicants respectfully request that the rejection of claims 1, 9 and 37 be reconsidered and withdrawn.

An indication of the allowability of all pending claims by issuance of a Notice of Allowability is earnestly solicited.

Respectfully submitted,

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